

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

LISA CUEVAS,
*Individually and on behalf of all others
similarly situated,*

Plaintiff,

v.

SONY GROUP CORPORATION,
d/b/a CRUNCHYROLL

Defendant.

Case No: 1:22-cv-04858

Judge: Sara L. Ellis

PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, Plaintiff Lisa Cuevas, by and through her counsel, respectfully moves this Court for leave to file a First Amended Class Action Complaint. In support thereof, Plaintiff states as follows:

1. Pursuant to the Federal Rule of Civil Procedure 15(a)(2), “a party may amend its pleading only with the opposing party’s written consent or the Court’s leave. The Court should freely give leave when justice so requires.” Fed.R.Civ.P. 15(a)(2).
2. On September 8, 2022, Plaintiff filed a Class Action Complaint seeking damages for Defendant’s alleged violations of the Video Privacy Protection Act, 18 U.S.C. § 2710 (“VPPA”).
3. Plaintiff named Sony Group Corporation d/b/a Crunchyroll as Defendant in this matter.
4. The differences between the proposed First Amended Class Action Complaint (attached hereto as Exhibit A) and the operative Complaint are minimal. In essence, Defendant

Sony Group Corporation d/b/a Crunchyroll will be removed and the Defendant will be renamed Sony Pictures Entertainment, Inc. d/b/a Crunchyroll in this action.

5. The interests of justice are served by allowing Plaintiff to amend her Complaint.
6. For the foregoing reasons, Plaintiff respectfully requests this Court grant this motion and deem the First Amended Class Action Complaint, attached hereto as Exhibit A, as filed of record.

Date: October 4, 2022

Respectfully Submitted:

By: /s/ Brandon M. Wise
Brandon M. Wise – IL Bar # 6319580
Adam Florek – IL Bar # 6320615
PEIFFER WOLF CARR
KANE CONWAY & WISE, LLP
73 W. Monroe, 5th Floor
Chicago, IL 60604
T: 312-444-0734
bwise@peifferwolf.com
aflorek@peifferwolf.com

Patrick Muench
BAILEY & GLASSER LLP
318 W. Adams St., Ste. 1512
Chicago, IL 60606
T: 312.500.8680
pmuench@baileyllasser.com

Michael L. Murphy (DC 480163)*
BAILEY & GLASSER LLP
1055 Thomas Jefferson Street NW
Suite 540
Washington, DC 20007
T: 202.494.3531
mmurphy@baileyllasser.com

* *to seek admission pro hac vice*

COUNSEL FOR THE PLAINTIFF AND THE PUTATIVE CLASS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date, a true and accurate copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notice and allow access to all parties of record.

/s/ *Brandon M. Wise*